

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

MAILING ONLINE SERVICE

Docket No. MC98-1

THIRD INTERROGATORIES OF
MAIL ADVERTISING SERVICE ASSOCIATION INTERNATIONAL
TO USPS WITNESS GARVEY
(USPS-T1-16-18)

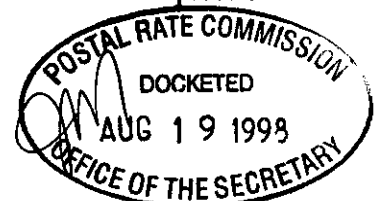
In accordance with Order No. 1216 of the Postal Rate Commission, the witness is requested to provide written responses to the following interrogatories within 10 days of the date hereof. For purposes of these interrogatories, "MOL" refers to the Mailing Online Service that is the subject of these proceedings.

MASA/USPS-T1-16. Referring to your response to MASA/USPS-T1-3:

a. Identify those instances of which you are aware where mail previously prepared and entered at the Postal Service by private businesses on behalf of their customers has been diverted to the Postal Service as a result of a Postal Service offering that is competitive with private business. Discuss whether you consider any of these instances comparable to MOL and why.

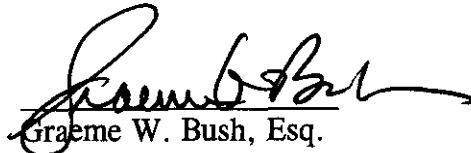
b. Do you consider the types of diversion from one private business to other private businesses referred to in your answer to be comparable to any diversion from private business to the Postal Service that might occur with MOL? If so, explain why.

MASA/USPS-T1-17. Referring to your response to MASA/USPS-T1-5(iii), that question sought your testimony as to the total universe of so-called "short run" direct mail from which the majority of MOL volume is projected to come. Your answer interpreted the question to seek evidence of the estimates for MOL volume itself. Please answer the question as clarified above.



MASA/USPS-T1-18. State the Postal Service's view of the relevance to the Commission's recommended decision of the impact of MOL on private businesses providing competitive services. Include in your answer a statement of what types of competitive impact would weigh against authorization of MOL and why.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Graeme W. Bush', written over a horizontal line.

Graeme W. Bush, Esq.

James Sottile, IV, Esq

CAPLIN & DRYSDALE, CHARTERED

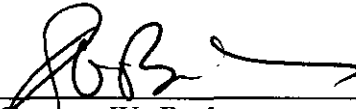
One Thomas Circle, NW

Washington, D.C. 20005

Counsel for Mail Advertising Service
Association International

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing interrogatories were served in accordance with Rule 12 of the Rules of Practice this 19th day of August 1998.



Graeme W. Bush